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BELLSOUTH
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September 10, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 98-121

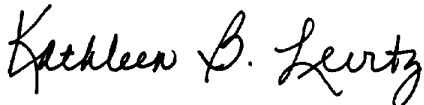
Dear Ms. Salas:

On September 9, 1999, William Stacy and I, representing BellSouth, spoke with Commission staff to answer additional questions posed by the staff about the scope of the revised Third-Party OSS Testing plan adopted by the Georgia Public Service Commission. Staff members participating in the call were William Agee and Andrea Kearney of the Common Carrier Bureau's Policy and Program Planning Division.

During the call Mr. Stacy explained the scope of the Georgia test, how it compared to the OSS tests conducted in New York and to those proposed for Florida. In addition he described some modifications to the specific responsibilities assigned to Hewlett-Packard and KPMG in conducting the Georgia test. A copy of the letter describing those changes is attached to this letter. Also attached is a copy of the KPMG report on the status of testing filed with the Georgia Commission on July 22, 1999.

In accordance with Section 1.1206, I am filing two copies of this notice in the proceeding identified above. Please place this notice in the records of both.

Sincerely,



Kathleen B. Levitz

Attachment

cc: William Agee
Andrea Kearney

No. of Copies rec'd
List ABCDE

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September 9, 1999

Mr. Leon Bowles
Georgia Public Service Commission
27 Trinity Avenue
Atlanta, Georgia 30334-5701

Docket Number 8354-U

In re: Order on Petition for Third Party Testing, dated 5/20/99

Dear Mr. Bowles:

Over the past several weeks Hewlett-Packard (HP), KPMG, and BellSouth have come to agreement that certain modifications need to be made to the specific responsibilities assigned to HP and KPMG in order to avoid a significant delay in the completion of the testing well beyond the time period originally contemplated by the Commission. The requested changes do not constitute a change in the direction or substance of the OSS testing that was detailed in the Commission's May 20, 1999 order

This will confirm the following assignments of responsibilities, which were discussed on the conference call held Tuesday, September 7, 1999. Our plan is that these modifications would take effect immediately and would be communicated to interested parties in the next periodic report filed by KPMG.

1. KPMG will be assigned the responsibilities of Test Manager in Addition to the Firm B auditor role they are now fulfilling. These responsibilities will include:
 - a. Preparation and approval of the specific test plans for each of test domains, including Pre-ordering, Ordering and Provisioning, Billing, Maintenance and Repair, Forecasting and Change Management, as well as all volume testing associated with each of these domains, consistent with the Commission's May 20, 1999 order and the Master Test Plan.
 - b. Preparation of Local Service Request data, pre-ordering data, billing data, or any similar data required to implement the test plans described in (a).
 - c. Direction of the execution of the test plans, reporting of results, and preparation of the final report for the Commission.
2. KPMG will independently monitor the test by managing the test as an independent third party.

3. HP will be assigned the responsibilities of preparing the Testing Infrastructure which includes, (a) preparing interfaces to conduct the test plans developed by KPMG, (b) transmitting and receiving the test data, and (c) collecting and reporting the results to KPMG.
4. Hewlett-Packard will further provide professional services as required ~~and~~ under the direction of KPMG both to help facilitate a smooth transition of responsibility and to most effectively leverage Hewlett-Packard's assets and expertise in the OSS testing arena.
5. KPMG will maintain the original Firm B responsibilities assigned by the Commission, including evaluation of the transactional and operational testing, comparison of the testing results to those reported by BellSouth's OSS reporting systems, and the audit of BellSouth's Percent Flow-Through Service Requests.
6. The scope and detail of the testing will be as described in the Master Test Plan as updated August 20, 1999 or as further clarified by approval of KPMG as Test Manager

This assignment of responsibilities will place KPMG and HP in roles similar to the roles these firms were assigned during the recently concluded test conducted by the NY-PUC of Bell Atlantic's OSS.

Sincerely,

Michael Weeks

Michael Weeks
Director, KPMG

Partner
DM7

[Signature]

9-8-99

Doug McMahon
Managing Partner, Hewlett Packard

W N Stacy

W. N. Stacy
Operations Vice President, BellSouth

Copy to: All Commissioners

**BellSouth OSS Testing Evaluation
Status Report
July 22, 1999**

1.0 Document Objective

In this document, KPMG provides a summary status report on developments related to the BellSouth 271 Testing Project. A brief overview of key developments is provided in section 2.0. A more detailed report on other test items is provided in the table in section 4.0. Each item presented in the table in section 4.0 includes a reference number that will identify the item in future status reports.

2.0 Key Developments

- **Master Test Plan (MTP)**
HP, BellSouth, KPMG, and the Commission have held several discussions to refine the content of the MTP. HP is currently incorporating comments from the most recent meetings and will file a revised draft MTP with the Commission during the week of July 26.
- **Roles and Responsibilities of the Commission, BellSouth, HP, and KPMG**
At the request of the Commission, a conference call was held to clarify roles and responsibilities of all testing parties on Tuesday, July 20, 1999. Topics discussed during the call included:
 - Process for approval of test entrance criteria
 - Process for development and approval of test evaluation criteria and performance standards
 - Process and responsibilities for conducting evaluation of test results
 - Clarification of test manager (HP) and audit (KPMG) roles by the Commission.
- **Connectivity**
 - As of July 20, BellSouth completed installation of two T-1 circuits at the HP test facility.
- **Training**
Training has been held or is scheduled for HP and KPMG as follows:
 - Advisory Team Overview held July 1-2 in Atlanta
 - EDI-PC training held July 9 in Birmingham, AL
 - TAG training held July 13-14 in Atlanta
 - Performance metrics overview training held July 14 in Atlanta
 - UNE training scheduled for July 27-28 in Atlanta
- **Mission Critical Element Meeting**
HP hosted an all-day meeting that included BellSouth and KPMG representatives to discuss mission-critical test elements on June 19, 1999.



**BellSouth OSS Testing Evaluation
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Topics discussed included:

- Identification of key project management and functional contacts at HP, BellSouth, and KPMG
 - Processes for communication among test parties
 - Test entrance and exit criteria and dependencies
- Status Meetings
Bi-weekly status calls between BellSouth, HP, and KPMG have been scheduled every Tuesday and Thursday at 2:00 EDT.

3.0 Key Upcoming Activities

- HP will provide an initial project plan with targeted dates for the completion of test activities on July 23.
- HP will provide a revised MTP to the Commission during the week of July 26.
- HP will provide a date on which the test evaluation criteria will be completed on July 26.
- BellSouth will provide UNE training on July 27-28 in Atlanta. HP is negotiating dates for TAFI and Billing training.
- KPMG will provide a document describing representative audit activities to the test parties by July 28.

**BellSouth OSS Testing Evaluation
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4.0 Specific Item Status

Ref	Item	Status	Issues	Next Step/Resolution
I-1	Master Test Plan (MTP) revisions	<ul style="list-style-type: none"> Ownership of MTP transferred to HP. Initial revisions based on KPMG, BellSouth and Commission comments have been incorporated. Further revisions have been discussed and HP is incorporating. HP anticipates filing a revised MTP with the Commission during the week of July 26. 	<ul style="list-style-type: none"> Evaluation criteria and performance measures not fully defined. Commission approved performance measures can serve to identify evaluation measures and standards for some transactional tests. 	<ul style="list-style-type: none"> Meeting between BellSouth, HP, and KPMG scheduled to develop evaluation criteria and define performance measures for transactional and procedural tests.
			<ul style="list-style-type: none"> Test issues identified as requiring further definition or information as of this date include: <ul style="list-style-type: none"> Specific knowledge of BellSouth systems and processes required to determine if MTP aligns to actual BellSouth practice in each test area Identification of system components to be included in the scalability evaluation 	<ul style="list-style-type: none"> BellSouth will provide additional information on business processes and system behavior. HP and KPMG will make revisions to the test design based on this information as related to the test objectives.
I-2	Test bed development	<ul style="list-style-type: none"> BellSouth has proposed to HP a list of scenarios that are candidates for provisioning. HP is analyzing scenarios to determine the number of lines that need to be provisioned. 	<ul style="list-style-type: none"> Ability to conduct extensive tests (provisioning, billing, and maintenance & repair) on provisioned lines needs to be ensured. Factors to be considered in determining the number of provisioned accounts/lines are statistical significance of test target and results, as well as product, geographic, CO, and switch type diversity. 	<ul style="list-style-type: none"> HP will propose a provisioning strategy.
I-3	T-1 connectivity	<ul style="list-style-type: none"> Two T-1s have been installed and have electronic connectivity. 	<ul style="list-style-type: none"> No major issues 	<ul style="list-style-type: none"> Completed



**BellSouth OSS Testing Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
I-4	Interconnection agreement	<ul style="list-style-type: none">BellSouth attorneys have indicated that HP is not required to sign an interconnection agreement.	<ul style="list-style-type: none">No major issues	<ul style="list-style-type: none">Completed
I-5	Virtual CLEC collocation	<ul style="list-style-type: none">BellSouth has identified an internal team to develop plans for a collocation arrangement to allow for provisioning of facilities to the virtual CLEC. Three central offices are being wired to provide the appearance of collocation of virtual CLEC facilities. The wiring is being implemented in such a way that BellSouth technicians will not know that the facilities are for a virtual CLEC. Due to time issues, implementation of the plan has begun.	<ul style="list-style-type: none">Specific provisioning recommendations have not been made by HP; additional central offices may need to be wired.	<ul style="list-style-type: none">BellSouth to provide additional detail on collocation proposal to HP and KPMG.
I-6	EDI functional testing	<ul style="list-style-type: none">Pre-requisites to functional testing: Four pre-test phases need to be completed prior to the initiation of functional testing. These phases are connectivity, syntax, end-to-end, and SRT (system readiness testing). HP has not begun EDI connectivity testing.	<ul style="list-style-type: none">No major issues	<ul style="list-style-type: none">HP scheduling connectivity testing for Wednesday, July 28.
		<ul style="list-style-type: none">Pre-Testing Dates: BellSouth procedure dictates that dates for the last 3 testing phases be set after connectivity testing has been completed. A conference call on 7/21/99 to determine testing dates was cancelled by HP.	<ul style="list-style-type: none">Connectivity testing must be completed to initiate subsequent stages of process	<ul style="list-style-type: none">HP has rescheduled a conference call with BellSouth to discuss setting dates for pre-test activities.
		<ul style="list-style-type: none">HP has submitted the required forecast forms in order to establish trading partner ID setup.	<ul style="list-style-type: none">None	<ul style="list-style-type: none">Completed



BellSouth OSS Testing Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none">Interface Development: HP has indicated the desire to be prepared to use both EDI PC and EDI via a LAN-to-LAN connection. Currently, HP has installed the EDI PC software and has the infrastructure for LAN-to-LAN EDI set up on an HP UNIX platform. HP has inquired whether EDI PC via a direct connection is possible. BellSouth indicated that such a connection is supported by their systems, and they currently have trading partners using this option.	<ul style="list-style-type: none">Feasibility of EDI-PC direct connection that would allow for collection of all performance metrics is in question	<ul style="list-style-type: none">HP will research the availability of EDI direct connect software with Harbinger. If the connection is feasible, HP will research their ability to track the required performance metrics via this setup.
I-7	TAG functional testing	<ul style="list-style-type: none">Pre-requisites for functional testing: Four pre-test phases need to be completed prior to the initiation of functional testing. These phases are connectivity, application testing, validity testing, and SRT. HP has completed the first phase of establishing TAG connectivity.Application/Interface development: The HP client application for TAG needs to be developed prior to the initiation of application testing. HP has not yet indicated an estimated date for the completion of this program.	<ul style="list-style-type: none">No major issues	<ul style="list-style-type: none">HP needs to complete BellSouth exit criteria for connectivity testing.



**BellSouth OSS Testing Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
I-8	Billing functional testing	<ul style="list-style-type: none">• HP is currently considering the option of submitting test LSRs via EDI-PC to be billed in order to advance the start date of the test and allow for completion of two billing cycles. Final determination has not been made.	<ul style="list-style-type: none">• No major issues	<ul style="list-style-type: none">• HP to provide final determination on possible use of EDI-PC for submitting LSRs to be billed.
		<ul style="list-style-type: none">• Q-Accounts have been provided to HP by BellSouth.	<ul style="list-style-type: none">• No major issues	<ul style="list-style-type: none">• Completed
		<ul style="list-style-type: none">• Billing training is currently being scheduled for HP (dates not yet known).	<ul style="list-style-type: none">• Billing training is not currently offered on an ongoing basis to CLECs. Based on CLEC demand, BellSouth is in the process of developing the training to be instituted as a regular course offering.	<ul style="list-style-type: none">• BellSouth to provide dates for training.
I-9	M&R functional testing	<ul style="list-style-type: none">• Application/interface development: For TAFI (dial-up interface), HP has provided information required for issuance of SecurIDs by BellSouth. For ECTA (machine-to-machine interface), HP will not build their own interface. BellSouth will provide an available test machine to HP.	<ul style="list-style-type: none">• TAFI training has not been scheduled. Discussions on ECTA processes and functionality have not been scheduled.	<ul style="list-style-type: none">• BellSouth to provide dates for TAFI training and an opportunity to discuss ECTA processes and functionality.
		<ul style="list-style-type: none">• ECTA joint implementation agreement (JIA) documentation has been provided to HP. HP has requested application programming interface (API) documentation.	<ul style="list-style-type: none">• No major issues	<ul style="list-style-type: none">• BellSouth to provide ECTA API documentation

September 9, 1999

Mr. Leon Bowles
Georgia Public Service Commission
27 Trinity Avenue
Atlanta, Georgia 30334-5701

Docket Number 8354-U

In re: Order on Petition for Third Party Testing, dated 5/20/99

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Sincerely,

Michael Weeks
Partner, KPMG

Doug McMahon
Managing Partner, Hewlett Packard

W. N. Stacy
Operations Vice President, BellSouth

Copy to: All Commissioners